

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

KAREN S. ROWLAND,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC.;

MRS BPO, L.L.C.;

CONVERGENT OUTSOURCING, INC.;

NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2006-4;

NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2007-4; and

U.S. BANK NATIONAL ASSOCIATION,

Defendants.

Civil Action No. 3:23-cv-258  
Hon. M. Hannah Lauck

**TRANSWORLD SYSTEMS INC., CONVERGENT OUTSOURCING INC., AND MRS  
BPO, L.L.C.'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants, Transworld Systems Inc., Convergent Outsourcing, Inc., and MRS BPO, LLC, submit this Motion to Dismiss the Amended Class Action Complaint (Doc. 10) filed by plaintiff, Karen Rowland. TSI, COI, and MRS respectfully request the Court dismiss Plaintiff's Amended Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(6). A Memorandum in Support of this Motion, detailing the law and facts that entitle movants to the requested relief is submitted herewith.

Dated: September 8, 2023

Respectfully submitted,

/s/ William D. Bayliss

William D. Bayliss, Esq.  
Virginia Bar No. 13741  
Joseph E. Blackburn, Esq.  
Virginia Bar No. 81871  
WILLIAMS MULLEN  
200 South 10th Street, Suite 1600  
P.O. Box 1320 (23218)  
Richmond, VA 23219  
Telephone: (804) 420-6459  
Facsimile: (804) 420-6507  
bbayliss@williamsmullen.com  
jblackburn@williamsmullen.com

Bryan C. Shartle, *Pro Hac Vice Pending*  
Justin H. Homes, *Pro Hac Vice Pending*  
Bradley J. St. Angelo, *Pro Hac Vice Pending*  
SESSIONS, ISRAEL & SHARTLE, LLC  
3838 North Causeway Blvd, Suite 2800  
Metairie, LA 70002-7227  
Telephone: (504) 828-3700  
Facsimile: (504) 828-3737  
bshartle@sessions.legal  
jhomes@sessions.legal  
bstangelo@sessions.legal

*Counsel for Transworld Systems Inc., Convergent  
Outsourcing, Inc., and MRS BPO, L.L.C.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8th day of September, 2023, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of this filing will be sent to all parties of record by operation of the Court's electronic filing system.

/s/ William D. Bayliss

William D. Bayliss, Esq.